

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 9/3/2014, 9/4/2014	Man Days: 2
Inspection Unit: Mattoon	
Location of Audit: Mattoon	
Exit Meeting Contact: Dallas Jett	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Charles Gribbins	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Dallas Jett	Superintendent of Quality Assurance	

Gas System Operations		Status
<u>Category Comment:</u>		
<i>This information was reviewed at the Pawnee Training Center on February 18-20-2014</i>		
Gas Transporter		Not Checked
Annual Report (Form 7100.1-1) reviewed for the year:		Not Checked
Unaccounted for Gas		Not Checked
Number of Services		Not Checked
Miles of Main		Not Checked
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)		Satisfactory
Operating Pressure (Feeder)		Various pressure setting

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Operating Pressure (Town)	Various pressure settings
Operating Pressure (Other)	Various pressure settings
MAOP (Feeder)	Various Pressure settings
MAOP (Town)	Various Pressure Settings
MAOP (Other)	Various Pressure Settings
Does the operator have any transmission pipelines?	Yes
<u>General Comment:</u> <i>Transmission records were reviewed at other locations that house transmission records.</i>	
Regulatory Reporting Records	Status
<u>Category Comment:</u> <i>This information was reviewed at the Pawnee Training Center on February 18-20-2014.</i>	
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?
Did the operator have any plastic pipe failures in the past calendar year?	
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?	
[191.23(a)]	Did the operator report Safety Related Conditions?
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?

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DRUG TESTING		Status
<u>Category Comment:</u> <i>A review of Ameren's drug and alcohol plan was completed in 2011 and not as part of this audit.</i>		
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
TEST REQUIREMENTS		Status
<u>Category Comment:</u> <i>Service cards and work orders were reviewed which indicated that pressure testing was conducted as required.</i>		
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
UPRATING		Status
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
<u>General Comment:</u> <i>All uprating for pressures that would produce a hoop stress of 30% or more were reviewed at the Decatur office.</i>		
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
<u>General Comment:</u> <i>There was no uprating in the Mattoon Operating Center in 2013.</i>		
OPERATIONS		Status
<u>Category Comment:</u> <i>The O&M Manual was initially reviewed on 2-18-20-2014, Ameren provided an updated O&M Plan in July 2014.</i>		
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
<u>General Comment:</u> <i>The operator's OQ Plan was reviewed at the Pawnee Training Center on 2-19-2014</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u>		

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<i>The laptops in each truck contain the records, maps and operating history.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u> <i>The operator was able to provide documentation demonstrating that the Quality Assurance reporting process addresses deficiencies in the effectiveness of the normal O&M Procedures.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Not Checked
<u>General Comment:</u> <i>The continuing surveillance records were inspected at the Pawnee Training Center on February 18-20-2014</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
<u>General Comment:</u> <i>The operator does not have any cast iron within the distribution system.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
<u>General Comment:</u> <i>The operator does not have any cast iron within the Distribution system.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
<u>General Comment:</u> <i>The operator does not have any caulked bel or spigot joints within the distribution system</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
<u>General Comment:</u> <i>The operator does not have any caulked bel or spigot joints within the distribution system</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status

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Refer to operator Qualification Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>Staff reviewed the OQ records and plan at the Pawnee Training Center in Pawnee on 2-19-14</i>		
DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u> <i>This information was reviewed at the Pawnee Training Center On February 18-20-2014</i>		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Checked
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Checked
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
EMERGENCY PLANS		Status
<u>Category Comment:</u> <i>This section was reviewed at the Pawnee Training Center on February 18-20-2014.</i>		
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Not Checked
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Not Checked
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Not Checked
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the	Not Checked

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	operator established and maintained liaison with appropriate fire, police and other public officials?	
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Checked
PUBLIC AWARENESS PROGRAM - RECORDS		Status
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
<u>General Comment:</u>		
<i>This information was reviewed at the Pawnee Training Center on February 20-2014</i>		
ODORIZATION OF GAS		Status
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Satisfactory
[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Applicable
<u>General Comment:</u>		
<i>This is a requirement for Master Meter Operators only.</i>		
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Applicable
<u>General Comment:</u>		
<i>This is a requirement for Master Meter Operators only.</i>		
PATROLLING & LEAKAGE SURVEY		Status
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Not Applicable
<u>General Comment:</u>		
<i>The operator does not have any patrols in the business districts.</i>		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Satisfactory
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Satisfactory
<u>General Comment:</u>		
<i>Inside meter sets are included in the business district surveys, Staff reviewed documents indicating inside meters.</i>		

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[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
<p><u>General Comment:</u></p> <p>At the present time Ameren Illinois has a waiver to conduct residential leak surveys and Atmospheric corrosion on a four year cycle. Staff reviewed these records and verified the four year cycle is being maintained.</p> <p>Inside meter sets are being leak survey on the same cycle as the residential and business district leak surveys.</p>		
YARD LINES - RESIDENTIAL		Status
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
<p><u>General Comment:</u></p> <p>The operator does maintain a list of yard lines which was provide during the records inspection.</p>		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Satisfactory
<p><u>General Comment:</u></p> <p>Yard lines are leak survey every three years in lieu of cathodic protection.</p>		
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Satisfactory
<p><u>General Comment:</u></p> <p>Yard lines are leak survey every three years in lieu of cathodic protection.</p>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Satisfactory
<p><u>General Comment:</u></p> <p>Staff reviewed abandonment records to verify the process used.</p>		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Satisfactory
<p><u>General Comment:</u></p> <p>Abandoned mains are maintained in the mapping system.</p>		

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[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the electronic records in the OAS System to verify that when service to a customer was disconnected that the following was accomplished: locked, mechanical fittings, or disconnected. The records indicated that the valves were closed and a locking device was used to prevent the customer from turning the gas back on.</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
<u>General Comment:</u> <i>The operator did not have any pipeline facilities abandoned under or through a commercially navigable waterway.</i>		
PRESSURE LIMITING AND REGULATION		Status
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>An Engineering evaluation is performed every year on pressure stations. These records were provided in electronic format.</i>		
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>An Engineering evaluation is performed every year on pressure stations. These records were provided in electronic format.</i>		
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Not Checked
<u>General Comment:</u> <i>These records are maintained by gas control in the Springfield Office, this inspection will be conducted at a later date.</i>		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory	Not Checked

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	operating conditions?	
General Comment: <i>These records are maintained by gas control in the Springfield Office, this inspection will be conducted at a later date.</i>		
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Checked
General Comment: <i>These records are maintained by gas control in the Springfield Office, this inspection will be conducted at a later date.</i>		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Checked
General Comment: <i>These records are maintained by gas control in the Springfield Office, this inspection will be conducted at a later date.</i>		
VALVE MAINTENANCE		Status
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Staff reviewed the electronic records for valve inspections and noted that valves were inspected as required.</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>The operator did not have any vaults that were greater than 200 cubic feet in the Mattoon Service area.</i>		
Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Checked
General Comment: <i>These records were checked at the Pawnee Training Center on February 18-20-2014</i>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked
General Comment: <i>These records were checked at the Pawnee Training Center on February 18-20-2014</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification as required?	Not Checked
General Comment:		

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[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
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General Comment:

The NDT records were reviewed at a previous audit at the Decatur Plaza Office.

[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
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General Comment:

The NDT records were reviewed at a previous audit at the Decatur Plaza Office.

JOINING OF MATERIAL OTHER THAN WELDING	Status
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Category Comment:

This information was reviewed at the Pawnee Training Center on February 18-20-2014

[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Not Checked
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Not Checked
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Not Checked

CORROSION CONTROL RECORDS	Status
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[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Satisfactory
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory

General Comment:

Staff reviewed Buried Pipe Examination Form.

[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
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General Comment:

Staff reviewed the pipe to soil readings taken throughout the year and all readings where within the -.85 volt criteria.

[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Applicable
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General Comment:

There are no rectifiers or other impressed current power sources in the Mattoon Service area.

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[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the electronic records for critical interference bonds, there is only one in the Mattoon Service area.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u> <i>In the Mattoon Service area they only had to readings that required a follow-up inspection.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Applicable
<u>General Comment:</u> <i>There is no unprotected pipelines in the Mattoon Service area.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the information for ten Casings in the Mattoon Service Area.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Satisfactory
<u>General Comment:</u> <i>It appears for the review of the electronic records there is sufficient number of test stations.</i>		
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Applicable
<u>General Comment:</u> <i>At the present time the operator has not had any problems with any test leads on the cathodic protection system.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Satisfactory
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
<u>General Comment:</u>		

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<i>The operator stated that they do not transport corrosive gas.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
<u>General Comment:</u> <i>Internal corrosion inspections are logged on the Buried Pipe Examination whenever pipe is removed from the system.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
<u>General Comment:</u> <i>This done mostly on the transmission pipelines. But the operator does look at coupons when removed during tapping procedures, and will make comments if anything is found at that time. This information will be found on the Buried Pipe Examination Form.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
<u>General Comment:</u> <i>At the current time Ameren Illinois has a waiver to allow them to monitor Atmospheric corrosion on a four year cycle the same as the leak survey cycle, any issues found are listed on the leak survey sheets, and then this information is taken and assigned for corrective action.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
[192.491][192.483(a), 192.483(b), 192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Satisfactory
TRAINING - 83 IL ADM. CODE 520		Status
<u>Category Comment:</u> <i>This information was inspected at the Pawnee Training Center on February 18-20-2014</i>		
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked

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